

Alex Meggitt, OSB No. 174131
ameggitt@ojrc.info
Amanda Lamb, OSB No. 222284
alamb@ojrc.info
Oregon Justice Resource Center
PO Box 5248
Portland, OR 97208
Tel: 503-944-2270
Fax: 971-328-3982

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

DARRELL KIMBERLIN,

Plaintiff,

v.

CITY OF PORTLAND, STATE OF OREGON,
TRAVIS HAMPTON, and JOHN DOES 1 AND
2,

Defendants.

Case No. 3:22-cv-01328-SI

UNOPPOSED MOTION FOR EXTENSION
OF TIME

LR 7-1 CERTIFICATION

Pursuant to Local Rule 7-1, Alex Meggitt, Counsel for Darrell Kimberlin, hereby certifies that he conferred with Counsel for Defendants on October 4, 2023, and they do not oppose this motion.

RELIEF REQUESTED

MOTION FOR EXTENSION OF TIME

Plaintiff requests an extension of the discovery deadlines in this matter. Plaintiff requests 90 additional days to complete discovery and to extend the Joint ADR Report and PTO deadlines accordingly.

ARGUMENT AND AUTHORITY

Case schedules can be modified and extended based upon showings of “good cause.” Fed. R. Civ. P. 16(b)(4). The current close of discovery for this case is October 5, 2023. Here, there is good cause for an extension of the discovery deadline to January 3, 2024, and of the Joint ADR Report and PTO deadlines to February 4, 2024, due to continuing engagement in the discovery process and anticipated changes in counsel.

CONCLUSION

Based on the foregoing, Plaintiff requests that this unopposed motion be granted, and that the new response deadline be set.

DATED: October 5, 2023.

/s/ Alex Meggitt
Alex Meggitt, OSB No. 174131
PO Box 5248
Portland, OR 97208

Attorney for Plaintiff